

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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In re:

Nancy Virginia Focaccia

Bankruptcy Case No.: 23-12964-amc

Judge: Hon. Ashely M. Chan

Chapter 7

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Nancy Virginia Focaccia,

Plaintiff,

v.

JPMorgan Chase Bank, N.A.,

Defendant.

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Adv. Proc. No. 24-00051-amc

**STIPULATION EXTENDING  
TIME TO ANSWER OR  
OTHERWISE RESPOND TO  
AMENDED COMPLAINT**

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned, as counsel for Plaintiff, Nancy Virginia Focaccia, and counsel for Defendant, JPMorgan Chase Bank, N.A., that the time within which Defendant may answer, move or otherwise respond to Plaintiff's Amended Complaint is extended up to and including May 22, 2024.

Dated: April 22, 2024

**CIBIK LAW, P.C.**

*Attorneys for Plaintiff,*

Nancy Virginia Focaccia

**PARKER IBRAHIM & BERG LLP**

*Attorneys for Defendant,*

JPMorgan Chase Bank, N.A.

/s/ Michael I. Assad

Michael I. Assad, Esq.

/s/ Fred W. Hoensch

Fred W. Hoensch, Esq.